

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CR. NO. C-13-1075-2
	§	
JORGE JUAN TORRES LOPEZ	§	

**NOTICE OF INTENT TO PLEAD GUILTY**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, undersigned counsel for JORGE JUAN TORRES LOPEZ, the Defendant in the above styled and numbered cause, and files this his *Notice of Intent to Plead Guilty*, and for good cause and in support thereof would show this Honorable Court the following;

1. Defendant, JORGE JUAN TORRES LOPEZ, is a native and citizen of the Republic of Mexico;

2. On or about November 20, 2013, TORRES LOPEZ was charged in a two defendant, four count, federal indictment returned in the Corpus Christi Division of the Southern District of Texas. Defendant was charged with *Conspiracy to Launder Monetary Instruments*, in violation of Title 18, United States Code, Section 1956(h) - (Count One); *Bank Fraud*, in violation of United States Code, Section 1344 and 2 - (Count Two); *Mail Fraud*, in violation of United States Code, Section 1341- (Count Three); and *Wire Fraud*, in violation of United States Code, Section 1343 - (Count Four). Additionally, Defendant TORRES LOPEZ was noticed of the government's intent to forfeit money, accounts and property related to the Defendant, *NOTICE OF FORFEITURE*, Dkt 1;

3. Thereafter, on or about February 8, 2017, a Superseding Indictment was returned

against TORRES LOPEZ. Therein, Defendant was charged, alone, in a three count federal indictment. Count One charged *Conspiracy to Launder Monetary Instruments*, in violation of Title 18, United States Code, Section 1956(h), Count Two charged *Bank Fraud*, in violation of United States Code, Section 1344 and 2 and Count Three charged *Wire Fraud*, in violation of United States Code, Section 1343. Additionally, Defendant TORRES LOPEZ was noticed of the government's intent to forfeit money, accounts and property related to the Defendant, *NOTICE OF FORFEITURE*, Dkt 22;

4. On and before October 30, 2019, TORRES LOPEZ, in custody, in Mexico, on the above indictments and charges, waived extradition to the United States and consented to the jurisdiction of this Court, Dkt 36, 37 and 39;

5. On or about April 15, 2020, the above styled and numbered cause was set for *Trial and Jury Selection* to commence on or about June 22, 2020, Dkt.53;

6. Defendant TORRES LOPEZ, herein, gives notice to this Court, and to the government, of his knowing and voluntary *Notice of Intent to Plead Guilty*, pursuant to a plea agreement.

7. Defendant defers to this Honorable Court, and to the government, regarding the time and date of a setting for a re-arraignment, change of plea and plea of guilty hearing;

8. This *Notice of Intent to Plead Guilty* is sought so that Justice may be done.

WHEREFORE, PREMISES CONSIDERED, undersigned Counsel respectfully prays that this case be docketed for arraignment and Plea of Guilty.

Respectfully submitted,

By: /s/Carlos Solis

Carlos Solis

csolis@hilley-solis.com

Texas State Bar No.: 24060636

HILLEY & SOLIS LAW, PLLC

6243 W. Interstate 10 Suite 503

San Antonio, Texas 78201

(210) 446-5000 – Telephone

(210) 446-5001 - Fax

By: /s/Derek Hilley

Derek Hilley

dhilley@hilley-solis.com

Texas State Bar No.: 24056770

HILLEY & SOLIS LAW, PLLC

6243 W. Interstate 10 Suite 503

San Antonio, Texas 78201

(210) 446-5000 – Telephone

(210) 446-5001 - Fax

By: /s/Thomas Joseph McHugh

Thomas Joseph McHugh

Texas State Bar No.: 13675000

The Law Offices of Thomas

Joseph McHugh, PLLC

6243 W. Interstate 10 Suite 503

San Antonio, Texas 78201

(210) 446-5000 – Telephone

(210) 446-5001 - Fax

CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of June 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Jon Muschenheim  
Assistant United States Attorney  
Texas Bar No. 24032269  
800 N. Shoreline Blvd., Suite 500  
One Shoreline Plaza  
Corpus Christi, TX 77401

/s/ Carlos Solis